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07/17/2007

September 5, 2007

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: Required Submission of Information  
Safety Light Corporation Site  
Bloomsburg, Pennsylvania**

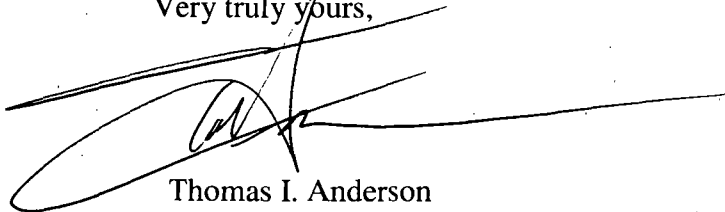
Dear Mr. Steinmetz:

I have received the above referenced request, and enclosed are the responses of CSX Transportation, Inc. (hereinafter "CSXT") to the questions posed. The request asked that CSXT also respond on behalf of the Pennsylvania Railroad Company, and you enclosed documents that appear to pertain to former operations of the Pennsylvania Railroad Company. CSXT is not a successor to, nor is it related to, the Pennsylvania Railroad Company, Penn Central, Lehigh Valley Railroad Company, or the Lehigh & New England Railroad Company. By virtue of the 1997 joint purchase of Conrail by CSXT's corporate parent, CSX Corporation, and the Norfolk Southern Corporation, certain of Conrail's assets, which were originally conveyed to Conrail out of the estates of several bankrupt northeastern railroads, were conveyed to Conrail's newly formed subsidiary, New York Central Lines LLC ("NYL"). In August 2004, NYL was merged into NYC Newco, Inc. ("Newco"), a Virginia corporation, and Newco was then merged into CSXT. Accordingly, CSXT has operated over the former NYL rail assets since June 1, 1999 and is now the owner of those assets.

As you may know, Conrail was formed by operation of federal law on April 1, 1976 and has no corporate predecessors. As noted above, many of the railroads in the eastern United States entered into bankruptcy in the late 1960s and early 1970s, including the Lehigh Valley Railroad Company, the New Jersey Central Railroad (successor to the Lehigh & New England Railroad) and Penn Central (successor to the Pennsylvania Railroad). The U.S. Congress responded to this rail crisis by passing the Regional Rail Reorganization Act of 1973 (the "3R Act"). See 45 U.S.C. §741. The 3R Act, among other things, established a government corporation, the U.S. Railway Association ("USRA"), charged with the formation of a new, private rail entity to take over the operations of the Bankrupt Railroads. Conrail was subsequently formed and, effective April 1, 1976, the various bankruptcy trustees conveyed most, if not all, of the operating assets of the bankrupt railroads to Conrail. By operation of federal law, the operating assets were conveyed to Conrail free of the pre-existing obligations and liabilities of the bankrupt railroads. See Penn Central Corporation v. United States, et al., 862 F.Supp. 437 (Sp.Ct.R.R.R.A., 1994), Consolidated Rail Corp. v. United States, 883 F.Supp. 1565 (Sp.Ct.R.R.R.A., 1995, and Consolidated Rail Corp. v. Pennsylvania Department of General Services, No. 97-RR-01, slip. op. (Sp.Ct.R.R.R.A. 1997). Some of the bankrupt railroads emerged from bankruptcy and continued to exist as viable non-operating entities.

As CSXT is not a successor to and has no relationship with the Pennsylvania Railroad Company, the responses contained herein pertain only to CSXT. If you have any further questions or would like to discuss any of the enclosed responses, please let me know.

Very truly yours,

A handwritten signature in black ink, appearing to be "T. Anderson", written over a horizontal line.

Thomas I. Anderson  
As Authorized Agent for CSX  
Transportation, Inc.

TIA/kdc

Enclosure

**Response to Questions  
Safety Light Corporation Site**

1. Describe in detail the business relationship between CSX and Safety Light.

**“CSX” as defined includes an entity with which CSX Transportation, Inc. (hereinafter “CSXT”) has no current or former relationship and for which CSXT cannot provide a response. Regarding CSXT, based on a review of available records, CSXT has no current business relationship with Safety Light.**

2. Did CSX ever transport and/or broker hazardous substances and/or radioactive waste or other wastes (including, but not limited to expired “EXIT” signs or other devices containing radioactive material) to the site for disposal or reclamation?

**“CSX” as defined includes an entity with which CSXT has no current or former relationship and for which CSXT cannot provide a response. Regarding CSXT, after review of available records, CSXT has not identified any shipments by CSXT of any wastes to the Site.**

3. If you answered “yes” to Question 2, please answer the following questions:

- a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

**n/a**

- b. Provide the time period during which you transported/brokered each customer/generator/transporter’s hazardous substances, radioactive waste or other wastes.

**n/a**

- c. Each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:

- 1) the entity which received the hazardous substances, radioactive waste or other wastes(i.e., Safety Light, U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);

**n/a**

- 2) the type of hazardous substances, radioactive wastes or other wastes that was disposed/reclaimed;

n/a

- 3) the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

n/a

- 4) the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;

n/a

- 5) all personal and/or internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Safety Light or Isolite;

n/a

- 6) the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

n/a

4. Did CSX ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Safety Light or Isolite at the Site?

**“CSX” as defined includes an entity with which CSXT has no current or former relationship and for which CSXT cannot provide a response. Regarding CSXT, after review of available records, CSXT has not identified any instances where wastes of any kind generated by CSXT were disposed of or reclaimed at the Site.**

5. If you answered “yes” to Question 4, please address the following issues:

- a. Please provide the; following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

- 1) the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;

**n/a**

- 2) the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

**n/a**

- 3) the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used for the process(es) that generated each;

**n/a**

- 4) the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

**n/a**

- 5) the method of treatment and/or disposal of the above.

**n/a**

- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- 1) disposed of or treated radioactive or hazardous materials at the Site;

**n/a**

- 2) arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

**n/a**

- 3) arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

**n/a**

c. If your response to the above includes the contracting of a hauler of transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

- 1) the persons with whom you, or other such person, made such arrangements;

**n/a**

- 2) every date on which such arrangements took place;

**n/a**

- 3) for each transaction, the nature and quantity of material, including its chemical content, characteristic, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

**n/a**

- 4) the precise locations at which each material was disposed or treated at the Site;

**n/a**

- 5) the persons who selected the Site as the place at which materials were disposed or treated;

**n/a**

- 6) the final disposition of each material involved in such transaction; and

**n/a**

- 7) the names of employees, officers, owners, and agents for each transporter.

**n/a**

- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:

- 1) the quantity (number of units, loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

**n/a**

- 2) any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat store, transport, or dispose of materials at the Site.

**n/a**

- e. Provide the names, titles, and areas of responsibility of any persons, including all CSX employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

**n/a**

- f. Describe any permits or applications and any correspondence between CSX and any regulatory agencies regarding materials transported to or disposed of at the Site.

**n/a**

- g. Provide copies of any correspondence between CSX and any third party regarding materials transported or disposed of at the Site.

**n/a**

- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment storage disposal, or transportation of such materials to the Site.

**n/a**

- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.

n/a

- j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

n/a

- k. For each question, provide the name title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

n/a

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any questions contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas or responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**“You” as defined includes an entity with which CSXT has no current or former relationship and for which CSXT cannot provide a response. CSXT has no knowledge of other persons who may be able to provide more information regarding the questions addressed to CSXT herein.**

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

**CSXT is not aware of any information or documents that are responsive to this Information Request.**

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**Upon information and belief, the following railroads emerged from bankruptcy and may have formerly owned and/or operated rail assets that have a relationship to the Site:**

**American Premier Underwriters (formerly Penn Central)  
c/o Benjamin Stonelake  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103-6998**

**The Reading Company  
550 S. Hope Street, Suite 1825  
Los Angeles, CA 90071**

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

**CSXT has no reason to believe that any documents that would have been responsive to this Information Request are no longer available.**

- a. Your documentation retention policy;

**n/a**

- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

**n/a**

- c. A description of the type of information that would have been contained in the documents; and

**n/a**

- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

**n/a**